

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re:

FRALEG GROUP, INC.,

Debtor.

Chapter 11

Case No. 22-41410-jmm

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that Morgan C. Fiander of Polsinelli PC, hereby enters her appearance on behalf of CAF Borrower GS, LLC, and requests that all notices given and all papers served in the above-captioned matter be given and served upon:

Morgan C. Fiander
Polsinelli PC
600 Third Avenue, 42nd Floor
New York, New York 10016
(212) 684-0199
Fax No. (212) 684-0197
mfiander@polsinelli.com

The foregoing request includes, without limitation, the notices and papers referred to in Bankruptcy Rules 2002 and 9007, the disclosure statement referred to in Bankruptcy Rule 3017, and also includes, without limitation, notice of any orders, applications, demands, complaints, hearings, motions, objections, petitions, pleadings, requests, plans and any other documents brought before the Court in this case, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telecopier, e-mail, or otherwise.

This entry of appearance and request for notice shall not be deemed or construed to be a waiver of any right to: (i) have final orders in non-core matters entered only after *de novo* review; (ii) trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto,

notwithstanding the designation *vel non* of such matters as “core proceedings” pursuant to 28 U.S.C. 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution; (iii) have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) assert any other rights, claims, actions, setoffs, or recoupments to which such party is or may be entitled, all of which are expressly reserved. Also this entry shall not be deemed to be implied consent to jurisdiction for any *Stern v. Marshall* category claims that the bankruptcy court may not have authority to enter.

Dated: New York, New York
August 15, 2022

POLSINELLI PC

By: /s/ Morgan C. Fiander
Morgan C. Fiander
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ATTORNEYS FOR CAF BORROWER GS LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of August, 2022, a true and correct copy of the foregoing *Notice of Appearance and Request for Notice* was served electronically to Debtor's counsel, the U.S. Trustee, and the interested parties who have requested service by ECF notification from the court.

/s/ Morgan C. Fiander